



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

December 4, 2003

CERTIFIED MAIL 7000 0520 0022 2558 3434 RETURN RECEIPT REQUESTED

Ms. Paule Dollins
Environmental Engineer
Ticona Polymers, Inc. - Bishop Facility
P.O. Box 428
Bishop, TX 78343

Dear Ms. Dollins:

Region 6 has reviewed your request dated November 25, 2003, for a nonsubstantive revision to Ticona Polymers, Inc.'s no migration petition reissuance dated August 28, 2001. This request was to include a specific gravity range which is equivalent to the existing density range in Petition Reissuance Approval Condition No. 5. This would make Ticona's compliance verification with Condition No. 5 easier since Ticona reports the specific gravity of the waste stream at 80°F (26.6 °C) for consistency with the UIC permits issued by TCEQ. EPA concurs that this revision does not impact the no migration demonstration approved August 28, 2001. I am therefore approving the request and changing the August 28, 2001, Petition Reissuance Approval Condition No. 5 to read as follows:

5. The characteristics of the injected waste stream shall at all times conform to those of Section 2 in the petition reissuance approved in 2001. The running three-whole calendar month volume weighted average density of the waste stream shall remain within a range of 0.996 to 1.106 g/cm³, measured at 80°F. This average density range is equivalent to a running three-whole calendar month volume weighted average specific gravity range of 0.999 to 1.110 at 80°F/80°F. The running three month average shall be calculated by multiplying each day's waste stream density/specific gravity value by that day's injected volume, totaling those values for the previous three-whole calendar month period, and dividing by that three month period injected volume.

If you have any questions or comments, please call Brian Graves at (214) 665-7193.

Sincerely yours,

A handwritten signature in black ink that reads "Larry Wright for". The signature is written in a cursive, flowing style.

Miguel I. Flores

Director

Water Quality Protection Division

cc: Ben Knape, TCEQ
Susan Clewis, TCEQ Region 14